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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

**Plaintiff,**

V.

ESTHER ANDRADE OLSON,

Defendant.

CASE NO. 5:23-MJ-00017-CDB

**STIPULATION AND PROTECTIVE ORDER  
(ATTORNEY'S EYES ONLY)**

WHEREAS, the discovery in this case involves information, including documentation, photographs, audio recordings, and video recordings, related to alleged victims whose private financial and personally identifiable information may be compromised if such information were disclosed (the “Protected Information”); and

WHEREAS, the parties desire to have the Protected Information produced to undersigned defense counsel:

The parties agree that entry of a stipulated protective order is appropriate.

THEREFORE, ESTHER ANDRADE OLSON (“Defendant”), by and through their counsel of record, MICHAEL BERDINELLA (“Defense Counsel”), and the United States of America, by and through Special Assistant United States Attorney Chan Hee Chu, hereby agree and stipulate as follows:

1       1. This Court may enter a protective order pursuant to Rule 16(d) of the Federal Rules of  
2 Criminal Procedure, and its general supervisory authority.

3       2. This Order pertains to the Protected Information. This Order also relates to any verbal  
4 communications between the government and Defense Counsel about the confidential informant.

5       3. By signing this Stipulation and Protective Order, Defense Counsel agrees not to share any  
6 documents, recordings, or other information, verbal or written, that contain Protected Information with  
7 anyone other than defense investigators and support staff. Defendant may review un-redacted  
8 documents, recordings, or other information subject to this protective order in the presence of Defense  
9 Counsel but may not be given copies of such documents. The parties agree that Defense Counsel,  
10 defense investigators, and support staff (the “defense team”) shall not allow Defendant or anyone else  
11 outside of the defense team to copy or retain Protected Information contained in the discovery.

12       4. The discovery and information therein may be used only in connection with the litigation  
13 of this case and for no other purpose. The discovery is now and will forever remain the property of the  
14 government. Defense Counsel will return the discovery to the government or certify that it has been  
15 destroyed at the conclusion of the case.

16       5. Defense Counsel will store the discovery in a secure place and will use reasonable care to  
17 ensure that it is not disclosed to third persons in violation of this agreement.

18       6. Defense Counsel shall be responsible for advising Defendant, employees, other members  
19 of the defense team, and defense witnesses of the contents of this Stipulation and Order.

20       7. In the event that Defendant substitutes counsel, undersigned Defense Counsel agrees to  
21 withhold discovery from new counsel *unless and until* substituted counsel agrees also to be bound by  
22 this Order.

23       8. Defense Counsel reserves the right to later seek to have the terms of this Order modified or  
24 revoked. Defense Counsel agrees to return the discovery to the Government in its complete form if the  
25       ///  
26       ///  
27       ///  
28       ///

1 terms of this Order are modified or revoked if so requested by the United States.

2 IT IS SO STIPULATED.

3 DATED: June 8, 2023

4 PHILLIP A. TALBERT  
United States Attorney

5 /s/ Chan Hee Chu  
6 CHAN HEE CHU  
7 Special Assistant U.S. Attorney

8 DATED: June 8, 2023

9 /s/ Michael Berdinella  
10 MICHAEL BERDINELLA  
11 Attorney for Defendant

12 IT IS SO ORDERED.

13 Dated: June 9, 2023



14 \_\_\_\_\_  
15 UNITED STATES MAGISTRATE JUDGE